STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

Partners, Successors, Agents and Assigns, and Kevin James Reed, individually.			File No. 0900460
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CONSENT ORDER OF PROHIBITION

TO THE RESPONDENTS:

Lambert Clark Group, L.L.C. 2625 Butterfield Road, Suite 138 South

Oak Brook, Illinois 60523

Lambert Clark Group, L.L.C. c/o Incorp Services, Inc., R.A. 2501 Chatham Road, Suite 110 Springfield, Illinois 62704

LCG Global Assets Limited 2625 Butterfield Road Oak Brook, Illinois 60523

LCG Global Assets Limited 2610 Allen Street, No. 2506 Dallas, Texas 75204-0000

LCG Global Assets Limited c/o Christopher L. Springer, R.A. 3102 Maple Avenue, Suite 400 Dallas, Texas 75201

Kevin James Reed 1908 Cromwell Drive Wheaton, Illinois 60187

Kevin James Reed c/o Lambert Clark Group, L.L.C. 2S676 State Route 59, Unit 2 Warrenville, Illinois 60555

WHEREAS, Lambert Clark Group, L.L.C., LCG Global Assets Limited, and Kevin James Reed on the 3 day of May, 2011, executed a certain Stipulation to Enter Consent Order of Prohibition, (the "Stipulation"), which hereby is incorporated by reference herein;

WHEREAS, by means of Stipulation acknowledges service upon it of the Notice Of Hearing of Petitioner Secretary of State, Securities Department dated March 26, 2010 (the "Notice");

WHEREAS, by means of the Stipulation, the Respondents acknowledged, while neither admitting nor denying the truth thereof that the following allegations contained in the Notice of Hearing shall be adopted as the Secretary of State's Findings of Fact:

- 1. That Respondent, Lambert Clark Group, L.L.C., ("Lambert"), is a Delaware Limited Liability Company admitted to transact business in Illinois with its principal offices at of 2S676 State Route 59, Unit 2, Warrenville, Illinois 60555, and 2625 Butterfield Road, Suite 138S, Oak Brook, Illinois 60523.
- 2. That Respondent LCG Global Assets Limited, ("LCG") is registered as an entity in Texas, U.S.A. with a registered address of 2610 Allen Street, No. 2506, Dallas Texas 75204, and its Illinois principal office and place of business is located at 2625 Butterfield Road, Oak Brook, Illinois 60523.
- 3. That Respondent Kevin James Reed, ("Reed"), is the managing director of Lambert, and a Director of LCG (collectively with Respondents Lambert and LCG "Respondents").
- 4. That in October of 2008, Respondents, operating as a Loan Broker in the State of Illinois by and through its representative(s), offered to procure a loan for a corporate group (the "Borrower") in return for an advance fee of Ten Thousand Dollars (\$10,000.00), which was prepaid by the Borrower.
- 5. That Borrower never received a loan or the return of his advance fee from the Respondent.
- 6. That the activities referenced at paragraph 4 by the above-referenced Respondents are the activities of a loan broker, and the Respondents operated as loan broker as that term is defined pursuant to Section 15-5.15. of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-1 et seq.] (The "Act").
- 7. That Section 15-10 of the Act provides, <u>inter alia</u>, that it shall be unlawful for any person to engage in the business of loan brokering unless registered under the Act.
- 8. That Section 15-85b. of the Act provides, <u>inter alia</u>, that it is prohibited under the Act for a loan broker to either directly or indirectly act as a loan broker without registration under the Act unless exempt under the Act.
- 9. That Section 15-85a. Of the Act provides, inter alia, that a loan broker shall not, in connection with a contract for the services of a loan broker, either directly or indirectly, do any of the following:

- 1) Employ any device, scheme or article to defraud.
- 2) Make any untrue statements of a material fact or omit to state a material fact necessary in order to make the statements made, in the light of circumstances under which they are made, not misleading
- 3) Engage in any act, practice or course of business that operates or would business that operates or would operate as a fraud or deceit upon any person
- 10. That at all times relevant hereto, LCG and Lambert their Officers Directors Employees, Affiliates, Successors, Agents and Assigns, and Reed individually, failed to disclose to Borrower that Lambert and Reed were investment advisers under the Illinois Securities Law of 1953.
- 11. That at all times relevant hereto, LCG and Lambert their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Reed individually, in their term letter requested Borrow to wire the advance fee of Ten Thousand Dollars (\$10,000.00) to an LCG account providing the routing and account numbers when in fact the routing and account numbers were for the Lambert account.
- 12. That at all times relevant hereto, LCG and Lambert their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Reed individually, failed to file an application for registration as a loan broker with the Secretary of State prior to the aforementioned loan offer from the State of Illinois.
- 13. That by virtue of the foregoing, LCG and Lambert their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Reed individually, has violated Section 15-10 and/or 15-85(a) and (b) of the Act.
- 14. That Section 15-55 of the Act provides, <u>inter alia</u>, if the Secretary of State shall find:
 - (c) that any person has violated any provision of this act, the Secretary of State may, by written order temporarily or permanently prohibit or suspend such person farom acting as a loan broker;
 - (d) that any person is acting or has acted as a loan broker as defined in Section 15-5..15 of this Act, without prior thereto having complied with the registration requirements of this Act, the Secretary of State may, by written order temporarily or permanently prohibit or suspend such person from acting as a loan broker.
- 15. That Respondents Lambert Clark Group, LLC, LCG Global Assets Limited, and Kevin James Reed, each, individually, their Officers, Directors, Employees, Partners, Successors, Agants and Assigns, are subject to a written order that PROHIBITS them from acting as a loan broker in this State,

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WHEREAS, by means of the Stipulation Respondents have agreed without admitting or denying the averments that the following shall be the Secretary of State's Conclusions of Law;

- 1. Respondents LCG and Lambert their Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Reed individually, has violated Sections 15-10 and 15-85(a) and (b) of the Act.
- 2. Respondents Lambert Clark Group, LLC, LCG Global Assets Limited, and Kevin James Reed, each, individually, their Officers, Directors, Employees, Partners, Successors, Agants and Assigns, are subject to a written order that permanently PROHIBITS them from acting as a loan broker in this State.

WHEREAS, by means of the Stipulation, Respondents acknowledged that they desire to enter into a Consent Order.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 15-55(d) of the Act:

Respondents Lambert Clark Group, L.L.C., LCG Global Assets Limited, and Kevin James Reed, each, individually, their officers and directors, agents, employees, affiliates, successors and assigns are permanently <u>PROHIBITED</u> from acting as a Loan Broker in or from the State of Illinois.

Dated: This Jaday of Time, 2011.

JESSE WHITE
Secretary of State
State of Illinois

Samuel F. Freiman Illinois Securities Department 69 West Washington Avenue, Suite 1220 Chicago, Illinois 60602 312-793-3988